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September 23, 2019

VIA ECF AND EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 723
New York, New York 10004-1408
Bernstein.chambers@nysb.uscourts.gov

*Re: Irving H. Picard v. Stanley Shapiro, et al., Adv. Pro. No. 10-05383 (SMB): Request for
Adjournment of Pre-Trial Conference*

Dear Judge Bernstein:

Plaintiff Irving H. Picard, as trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC and the chapter 7 estate of Bernard L. Madoff, and defendant Stanley Shapiro and the other defendants named in the above-captioned proceeding respectfully request an adjournment of the final pre-trial conference in anticipation of settlement.

Following the Court's order referring this proceeding to mediation before the Honorable Faith S. Hochberg, United States District Judge (ret.) (ECF No. 134), the parties reached a settlement in principle to resolve all claims against all defendants. The Trustee prepared a draft settlement agreement, and the parties have exchanged comments and are working cooperatively to finalize the agreement. To allow additional time to finalize the agreement and move the Court for an order approving the agreement under Rule 9019 of the Federal Rules of Bankruptcy Procedure, the parties respectfully request an adjournment of the pre-trial conference from September 25, 2019 to October 30, 2019.

A proposed order to adjourn the pre-trial conference is enclosed for Your Honor's approval.

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Respectfully submitted,

BAKER & HOSTETLER LLP

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Investment Securities LLC and the consolidated
estate of Bernard L. Madoff*

cc: Barry R. Lax, Esq., Lax & Neville LLP

Enclosure